

Andrew B. Downs, SBN 111435
E-mail: andy.downs@bullivant.com
BULLIVANT HOUSER BAILEY PC
101 Montgomery Street, Suite 2600
San Francisco, CA 94104
Telephone: 415.352.2700
Facsimile: 415.352.2701

Attorneys for Defendant Property & Casualty
Ins. Company of Hartford

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

SUZANNE CONNIFF,

Plaintiff,

vs.

PROPERTY & CASUALTY INS. COMPANY
OF HARTFORD; and DOES 1-10 inclusive,

Defendants.

Case No.: 2:21-cv-00995-TLN-DMC

**STIPULATION AND ORDER
MODIFYING DISCOVERY DEADLINES
- WITHOUT CHANGE TO REMAINING
DEADLINES**

Plaintiff Suzanne Conniff and defendant Property & Casualty Insurance Company of Hartford stipulate and request as follows:

1. Discovery presently closes on September 16. The parties have been working cooperatively to set and conduct depositions, but have run into a scheduling issue with two depositions which plaintiff wishes to take of individuals associated with Hartford. Part of the issue is driven by the fact that plaintiff's counsel is a solo practitioner who cannot be in two places simultaneously. Also contributing is the reality that defense counsel is effectively a solo until he can hire an associate or of counsel attorney to replace the attorneys who previously assisted him. His calendar is presently full of depositions and a mediation in other matters between now and September 16. Plaintiff's counsel is set for trial in early October in Southern California.

2. The parties propose to extend percipient discovery, compress expert discovery, and leave the other deadlines unchanged. This simply eliminates much of the current 60 day period between the close of percipient discovery and initial expert disclosures. The parties propose:

Deadline	Current	Proposed
Close of Percipient Discovery	September 16, 2022	October 21, 2022
Initial Expert Disclosures	November 15, 2022	November 22, 2022
Supplemental Expert Disclosures	December 15, 2022	Unchanged
Last Day to File dispositive motions	March 15, 2023	Unchanged

3. The parties also note that currently there is no cutoff for expert discovery. The parties propose that cutoff be set for January 15, 2023, 31 days after Supplemental Disclosures (considering the Christmas and New Years holidays are during that period), and 59 days before the last day for dispositive motions.

DATED: September 2, 2022

BULLIVANT HOUSER BAILEY PC

By /s/ Andrew B. Downs
Andrew B. Downs

Attorneys for Defendant Property & Casualty Ins.
Company of Hartford

DATED: September 2, 2022

THE O'CONNOR LAW FIRM

By /s/ Timothy O'Connor* (*e-mail auth., ABD)
Timothy O'Connor

Attorneys for Plaintiff Suzanne Conniff

ORDER

The parties having stipulated and having shown good cause,

IT IS HEREBY ORDERED that the deadlines for the close of percipient discovery and initial disclosures of experts are extended as follows:

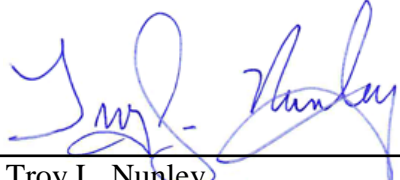
Close of Percipient Discovery October 21, 2022

Initial Expert Disclosures November 22, 2022

It is further ordered that the cutoff for expert discovery shall be January 15, 2023.

IT IS SO ORDERED.

DATED: September 2, 2022



Troy L. Nunley
United States District Judge